

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

**ASHEVILLE DIVISION**

<b>CARYN DEVINS STRICKLAND,</b>	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	<b>Civil No. 1:20-cv-00066</b>
	)	
<b>UNITED STATES OF AMERICA, <i>et al.</i>,</b>	)	
	)	
<i>Defendants.</i>	)	
	)	
	)	
	)	

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**JOINT MOTION FOR ENTRY OF CLAWBACK AGREEMENT AND FEDERAL RULE  
OF EVIDENCE 502(d) ORDER**

The Parties move for entry of the attached proposed Stipulated Clawback Agreement and Federal Rule of Evidence 502(d) Order. In support of this Motion, the Parties respectfully state the following:

1. The Parties have agreed upon the need for a clawback agreement regarding privileged documents.
2. The Parties agree the attached Stipulated Clawback Agreement Order will protect inadvertently disclosed privileged documents.
3. This Motion is made in good faith and upon good cause.

The Parties respectfully request that the Court grant this motion and enter the attached Stipulated Clawback Agreement Order.

This the 14th day of November, 2022.

Respectfully submitted,

/s/ Philip Andonian

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